

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 21-mj-2839
v.	)	
	)	JUDGE FRENSLEY
BRANDON MILLER	)	

**UNITED STATES' MOTION FOR DETENTION**

COMES NOW the United States of America by Mary Jane Stewart, Acting United States Attorney, and Joshua A. Kurtzman, Assistant United States Attorney, and moves this Court for detention of the Defendant in this matter under 18 U.S.C. § 3142.

The United States would submit that the conduct underlying the charges outlined in the Criminal Complaint involves significant danger to the community. As the Criminal Complaint alleges, Brandon Miller led a gun trafficking effort to purchase firearms in Middle Tennessee and illegally arm individuals involved in violent crimes and shootings in Chicago. The Defendant is also currently facing court martial proceedings through the military based upon an alleged sexual assault he committed. Likewise, as the Defendant faces significant civilian and military justice charges and has very few, if any, connections to the Middle District of Tennessee, the Defendant would pose a significant flight risk if he were released. Consequently, the United States submits that the Defendant is both a danger to the community and a flight risk and should be detained pending trial.

The United States respectfully requests a continuance of three business days in order to adequately prepare for the hearing in this matter.

Respectfully submitted,

MARY JANE STEWART  
Acting United States Attorney

By:

/s/ Joshua A. Kurtzman  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served electronically to counsel for defendant via CM/ECF and hand delivered on the 11th day of May 2021.

/s/ Joshua A. Kurtzman  
JOSHUA A. KURTZMAN